



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

APR 01 1993

Mr. Ivan Makil, President
Salt River Pima-Maricopa Indian Community
Route 1, Box 216
Scottsdale, AZ 85256

Re: Tri-Cities Landfill

Dear Mr. Makil

The purpose of this letter is to discuss our concerns and expectations regarding the Salt River Pima-Maricopa Indian Community's (SRPMIC) Tri-Cities Landfill (landfill). While the US Army Corps of Engineers (COE) will continue as lead federal agency to oversee the construction of the protective berm and stabilization of the landfill, there are four additional concerns we wish to raise with you.

The first issue is the design strength of the protective berm. Region 9 understands that the SRPMIC has contracted with the Simons Li and Associates (SLA) to complete the final work for this aspect of permanent protection of the landfill. Further, Region 9 understands that the SRPMIC's previous contractor (BRW) has asserted that the emergency berm is "high" enough to protect the landfill from a 170,000 to 180,000 cubic feet per second (cfs) flow rate. While berm elevation may be an important indicator of protection, Region 9 feels that additional design strength tests, such as scour analysis, should be conducted to certify the strength of the protective berm.

Secondly, Region 9 is concerned with the stabilization activities associated with the breached area (exposed face) of the landfill. It is critical that all design and construction stabilization activities take into account the final closure requirements of the revised municipal solid waste landfill criteria (40 CFR 258). Specifically, stabilization activities should be conducted to ensure that final closure requirements of 40 CFR 258.60 are met.

Thirdly, we ask SRPMIC to submit to us a more detailed project schedule, including a construction project management (CPM) plan which clearly identifies all activities associated with this project. This CPM should also establish timeframes and completion dates for all activities.

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Finally, Region 9 suggests that the SRPMIC begin the development and implementation of a groundwater investigation to characterize, early in the process, any potential problems associated with past operations. While at this point this requirement may be voluntary, if the landfill receives waste after October 9, 1993, groundwater monitoring would be a requirement of 40 CFR 258.

In closing, Region 9 strongly supports the COE and the SRPMIC in the progress that has been made in addressing this situation. Region 9 will continue to work with the COE and the SRPMIC in developing longer-range solutions to this problem.

If you have any questions, or need any additional information, please contact Jim Vreeland at 415/744-2096.

Sincerely,

Alexis Swans
for Harry Seraydarian, Director
Water Management Division

cc: COL R.L. VanAntwerp, COE
Steve Johnson, ADEQ

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